



2008

## FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING REPORT

**COMPANY:** Ping  
**COUNTRY:** United States  
**FACTORY CODE:** 480082768G  
**MONITOR:** ALGI  
**AUDIT DATE:** September 16, 2008  
**PRODUCTS:** T-Shirts  
**PROCESSES:** Custom Screen Printing,  
Embroidery  
**NUMBER OF WORKERS:** 15



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**Child Labor: Other - Child Labor**

Other

**Noncompliance**

**Explanation:** 1. There is no written child labor policy.

2. There is no written age verification procedure policy. It is the monitor's impression that the facility failed to create a written child labor and age verification procedure because they thought following state labor law was sufficient.

**Plan Of Action:** The requirement 3.1.1 does not require a written policy; it only requires that the factory have a policy. [State name] does not require a written policy; however the State and Federal laws are considered the policy of the company. In addition, since the company has adopted and posted the FLA Code of Conduct which addresses this issue, this should also be considered [Factory name's] policy. Also, the finding in 3.1.2 confirms that the system is in place to verify age.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**

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**Code Awareness:**

GEN.2 Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.

**Noncompliance**

**Explanation:** Factory does not communicate Code of Conduct to workers nor does it give regular training on this subject.

**Plan Of Action:** The employees pass the awareness section further down in your checklist. Also, the code of conduct is posted and visible in the break room. Ping has confirmed by interview (April 7, 2009) with the Company that the orientation materials have been modified to include the Code with Factory Workers.

**Deadline Date:** 04/07/2009

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

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## Health and Safety: Evacuation Requirements and Procedure

H&S.9 All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, the installation and maintenance of an employee alarm and emergency lighting systems, ensuring aisles/exits are not blocked and that workers are not blocked within their workstations, employee education, evacuation procedures, etc.) shall be complied with. Workers shall be trained in evacuation procedures. Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually. (S)

### Noncompliance

**Explanation:** 1. One exit door does not have an exit sign.

2. Aisles are not demarcated with yellow lines.

It is the monitor's impression that the deficiencies found are caused by the fact that facility lacks a system and procedures to regularly check safety and health issues and that they have not assigned a person to be responsible for the all H&S issues.

Legal References: 1. 29CFR1910.37(b)(2); 2. 29CFR1910.22(b)(2)

**Plan Of Action:** The regulation cited does not require yellow demarcation lines. The actual statement is that aisles and passageways be appropriately marked. The following is from an OSHA interpretation letter: Other appropriate methods such as marking pillars, powder stripping, flags, traffic cones, barrels and many other devices are considered appropriate as long as recognition of such is included in the vehicle operator and employee training programs. Factory denotes aisles and passageways by the placement and setting of equipment and tables and maintains that this is a valid method of marking passageways. Evacuation drills are the method of training.

**Deadline Date:** 03/19/2009

**Supplier CAP:**

**Supplier CAP Date:** 03/19/2009

**Action Taken:** During a re-audit by Ping it was confirmed that an EXIT sign had been posted and that a worker was designated to be accountable for safety and legal requirements.

**Plan Complete:**

Plan  
Complete  
Date:

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### Health and Safety: Safety Equipment and First Aid Training

H&S.10 All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be available in sufficient numbers throughout the factory, maintained and stocked as prescribed and easily accessible to workers. A sufficient number of workers shall be trained in first aid and fire fighting techniques. (S)

#### Noncompliance

**Explanation:** 1. Fire extinguishers do not receive monthly visual inspections.

2. One fire extinguisher is not properly mounted.

3. One fire extinguisher needs recharging or replacement.

4. Eye wash needs restocking.

5. First aid kits need replenishing.

It is the monitor's impression that the deficiencies found are caused by the fact that facility lacks a system and procedures to regularly check safety and health issues and that they have not assigned a person to be responsible for the all H&S issues.

Legal references: 1. 29CFR1910.157(e)(2); 2. 29CFR1910.157(c)(1); 3. 29CFR1910.157(c)(4); 4. 29CFR1926.57; 5. 29CFR1910.266 App A

**Plan Of Action:** The citation quoted is from the construction standard and is not applicable. Please use the correct citation. 6.4.4.4 and 6.4.4.5

1. Are first aid supplies adequately stocked? First aid kits need replenishing with commercial grade materials as per 29CFR1910.266 App A

2. Are first aid supplies appropriate for the types of injuries likely to occur? First aid kits need replenishing with commercial grade materials as per 29CFR1910.266 App A. The regulation cited is for the Logging industry and because [Factory name] is not involved with logging, this finding is invalid. (See scope and application below.) This is not a requirement for the [Factory name] if medical response is available like a fire department or other emergency responder. Scope and application. 1910.266(b)(1) This standard establishes safety practices, means, methods and operations for all types of logging, regardless of the end use of the wood. These types of logging include, but are not limited to, pulpwood and timber harvesting and the logging of saw logs, veneer bolts, poles, pilings and other forest products. This standard does not cover the construction or use of cable yarding systems.

**Deadline Date:**

**Supplier CAP:** Ping CAPA #2480 issued to [Factory name] on April 7, 2009.

**Supplier CAP Date:** 04/21/2009

**Action Taken:** The requirement for inspection of fire extinguishers will be communicated to a specific worker and followed up by Ping via a Corrective Action.

**Plan Complete:**

**Plan Complete Date:**

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## Health and Safety: Chemical Management and Training

H&S.13 All chemicals and hazardous substances shall be properly labeled and stored in accordance with applicable laws. Labels shall be placed in the local language and the language(s) spoken by workers, if different from the local language. Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances. (S)

### Noncompliance

**Explanation:** Chemicals/flammables not stored in segregated flameproof location.

It is the monitor's impression that the deficiencies found are caused by the fact that facility lacks a system and procedures to regularly check safety and health issues and that they have not assigned a person to be responsible for the all H&S issues.

Legal reference: 29CFR1910.106

**Plan Of  
Action:**

This finding is invalid, as specified in the following.

[Factory name] does not exceed the quantity limits specified below. Because they do not exceed the limit, no storage cabinet or segregated area is required. 1910.106(e)(2)(ii)(b) The quantity of liquid that may be located outside of an inside storage room or storage cabinet in a building or in any one fire area of a building shall not exceed:  
1910.106(e)(2)(ii)(b)(1) 25 gallons of Class IA liquids in containers 1910.106(e)(2)(ii)(b)(2) 120 gallons of Class IB, IC, II, or III liquids in containers 1910.106(e)(2)(ii)(b)(3) 660 gallons of Class IB, IC, II, or III liquids in a single portable tank. 1910.106(e)(2)(ii)(c) Where large quantities of flammable or combustible liquids are necessary, storage may be in tanks which shall comply with the applicable requirements of paragraph (b) of this section. Follow-up inspection of [Factory name] confirmed that all flammables fall below the storage cabinet requirements. No further action needed.

**Deadline  
Date:**

**Action  
Taken:**

**Plan  
Complete:**

**Plan  
Complete  
Date:**



### Health and Safety: Material Safety Data Sheets/Worker Access and Awareness

H&S.14 Material Safety Data Sheets (MSDS) for all chemicals used in the factory must be available at the usage and storage sites of the chemicals, in the local language and the language(s) spoken by workers, if different from the local language. Workers shall have free access to MSDS. (P)

#### Noncompliance

**Explanation:** MSDS not located in areas of use. It is the monitor's impression that the deficiencies found are caused by the fact that facility lacks a system and procedures to regularly check safety and health issues and that they have not assigned a person to be responsible for the all H&S issues.

Legal reference: 29CFR1910.1200

**Plan Of Action:** The standard quoted states that the MSDS must be readily available. [Factory name] has the MSDS book located in the front office approximately 30 to 40 feet from the location of the operation and near the exit door of the warehouse. Most, if not all, regulators would consider this acceptable practice. No further action required.

**Deadline Date:** 03/19/2009

**Supplier CAP:**

**Supplier CAP Date:** 03/19/2009

**Action Taken:** MSDS sheets were observed by a Ping auditor and they are updated and available at the front desk and back near the rear exit.

**Plan Complete:**

**Plan Complete Date:**

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## Health and Safety: Ventilation/Electrical/Facility Installation and Maintenance

H&S.17 All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and in such a manner as to prevent or minimize hazardous conditions to workers in the facility. (S)

### Noncompliance

**Explanation:** 1. Two light switches and one electric outlet receptacle are missing faceplates.

2. Four circuit breaker panels have unsealed openings.

3. One ungrounded multi-tap extension cord is in use.

It is the monitor's impression that the deficiencies found are caused by the fact that facility lacks a system and procedures to regularly check safety and health issues and that they have not assigned a person to be responsible for the all H&S issues.

Legal references: 1. 29CFR1926.404 (f) (7) (i) (B) (3); 2. 29CFR1926.404 (e) (1) (v); 3. 29CFR1926.405(a)(2)(ii)(c)

**Plan Of Action:** The regulation cited is for the construction industry and is not an appropriate citation. Ping performed a follow-up inspection and the issue had not been corrected. A Corrective Action will be issued.

**Deadline Date:** 04/30/2009

**Supplier CAP:** Ping CAPA #2481 issued to [Factory name] April 7, 2009.

**Supplier CAP Date:** 04/21/2009

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**